## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

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LISA D. BRYAN	*	AT
Plaintiff	*	er e
V.	*	Civil Action No. AMD 03 CV 0265
LUCENT TECHNOLOGIES, INC.	*	
Defendant	*	LODGED RECEIVED
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JENNIFER MAZZARELLO	*	FEB 03 2003
Plaintiff	*	AT BALTIMORE  CLERK U.S. DISTRICT COUR,  DISTRICT OF MARYLAND  BY  DEPUTY
v.	*	Civil Action No. AMD 02 CV 3576

## CONSENT MOTION TO CONSOLIDATE

LUCENT TECHNOLOGIES, INC.

Defendant

Lisa D. Bryan and Jennifer Mazzarello. Plaintiffs, by and through their attorney, Paul V. Bennett, hereby file this Motion to Consolidate pursuant to FRCP 42, and for grounds state:

- 1. That on or about August 20, 2002, Jennifer Mazzarello, Plaintiff, filed in the Circuit Court for Anne Arundel County a Complaint against Lucent Technologies, Defendant ("Defendant Lucent"), alleging gender discrimination and harassment, retaliation, and hostile work environment. Defendant Lucent subsequently filed a Notice of Removal to the United States District Court for the District of Maryland. Civil Action Number AMD 02 CV 3576.
- 2. That on or about January 29, 2003, Lisa D. Bryan, Plaintiff, filed in this Court a Complaint against Defendant Lucent, alleging gender discrimination and harassment,

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retaliation, and hostile work environment.

- 3. That the allegations raised by Lisa D. Bryan and Jennifer Mazzarello, Plaintiffs, in their respective Complaints involve common questions of law and fact, and involve common fact witnesses.
- 4. That it is appropriate to consolidate the above cases, as a consolidation of these matters will prevent unnecessary costs and delay.
- 5. That Defendant Lucent has consented to the consolidation of the above matters, as well as to the issuance of a new Scheduling Order.

WHEREFORE, Lisa D. Bryan and Jennifer Mazzarello respectfully request that this Honorable Court consolidate their respective cases, and that a new Scheduling Order be issued forthwith.

Respectfully Submitted,

DENIED THIS 310 DAY OF FUEL 20 03

ANDPE M. DAVIS

UN TED STATES DISTRICT JUDGE

Paul V. Bennett, Esq.

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Attorney for Plaintiffs